

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,)	
)	
Plaintiff)	
)	
V.)	Civil Action No. 04-11935-DPW
)	
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
)	
Defendants)	

**PLAINTIFF SHEILA PORTER'S MOTION FOR
EXTENSION OF TIME TO RESPOND TO GLOBE NEWSPAPER
COMPANY, INC.'S MOTION TO MODIFY PROTECTIVE ORDER**

NOW COMES Sheila Porter ("Mrs. Porter"), by her undersigned counsel, and requests an extension of time to September 15, 2005 to respond to the Globe Newspaper Company, Inc.'s ("Globe") Motion to Modify Protective Order. On August 25, 2005, Defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County ("Suffolk Defendants") filed an assented-to motion for extension of time to September 15, 2005, to respond to the Globe's motion. Counsel for the Suffolk Defendants did not confer with counsel for Mrs. Porter to determine if she wanted to join in their motion. Nevertheless, counsel for Mrs. Porter has conferred with counsel for the Globe, who agrees that the briefing schedule should be the same for all parties and has assented to the instant motion.

WHEREFORE Mrs. Porter respectfully requests that the Court grant this Motion and extend the deadline for Mrs. Porter to respond to the Globe's motion to September 15, 2005.

Respectfully submitted,

SHEILA J. PORTER

By her attorneys,

/s/ Davis S. Schumacher
Joseph F. Savage Jr. (BBO #443030)
David S. Schumacher (BBO #647917)
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Dated: August 29, 2005

CERTIFICATION UNDER LOCAL RULE 7.1 AND LOCAL RULE 37.1

I, David S. Schumacher, hereby certify that counsel for Sheila Porter conferred with counsel for the Globe Newspaper Company, Inc., who has assented to this motion.

Dated: August 29, 2005

/s/ David S. Schumacher
David S. Schumacher

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